

**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA**

ALEJANDRO VALLESILLO,

Plaintiff,

v.

SECURITY CREDIT SERVICES, LLC;

Defendant.

Case No.: 8:23-cv-00400-RFR-SMB

Honorable Judge Robert F. Rossiter, Jr.

Magistrate Judge Susan M. Bazis

DEFENDANT’S RULE 12(b)(2) MOTION TO DISMISS

Defendant, Security Credit Services, LLC (“Defendant” or “SCS”), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 12(b)(2), hereby submits this Rule 12(b)(2) Motion to Dismiss the Complaint of Plaintiff, Alenjandro Vallesillo (“Vallesillo” or “Plaintiff”) for lack of personal jurisdiction, and in support thereof states as follows:

1. For all the reasons stated and argued in the Memorandum of Law filed contemporaneously herewith and hereby incorporated by reference, Defendant moves this Court to dismiss Plaintiff’s Complaint for lack of personal jurisdiction.

WHEREFORE, Defendant Security Credit Servies, LLC respectfully requests that this Honorable Court grant its Motion, dismiss the Complaint of Plaintiff, Alejandro Vallesillo, for lack of personal jurisdiction, and for such other and further relief that the Court deems just and appropriate.

Dated: October 17, 2023

Respectfully Submitted,

SECURITY CREDIT SERVICES, LLC

/s/ Luke K. Chamberlain

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2023, a true and accurate copy of the foregoing was filed with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to all attorneys of record.

/s/ Luke K. Chamberlain
Luke K. Chamberlain

Counsel for Defendant.